

May 22, 2020

Regional Forester (Reviewing Officer)  
Pacific Northwest Regional Office  
Attn: 1570 Objections  
P.O. Box 3623  
Portland, OR 97208-3623

**Objection to the Spirit Lake Tunnel Intake Gate Replacement and Geotechnical Drilling Project located on the Mount St. Helens National Volcanic Monument, Gifford Pinchot National Forest, Skamania County, Washington (Responsible Official: Thomas A. Torres, Gifford Pinchot, Acting Forest Supervisor)**

Dear Regional Forester:

I am submitting this objection in accordance with the requirements of 36 CFR 218. As details of the project design are only now being brought to light in this draft decision notice, there are several areas of concern that have not been addressed in my previous comments. These are detailed here:

**DRAFT DECISION NOTICE**

**DREDGING**

Dredging and in-water disposal of materials are known to cause significant effects on a lake ecosystem. Spirit Lake has developed a delicate balance since the eruption, and massive substrate removal and dumping in the middle of the lake with have impacts on biota. The basin near the tunnel has exhibited decreased oxygen levels during summer stratification as recorded by Dr. Gawel at University of Washington. Adding organic matter to the deep water will likely further depress oxygen levels and may make a portion of the lake inhabitable for fish and other aquatic organisms. The draft decision notice does not consider this impact at all and researchers studying the lake were not consulted on possible impacts during earlier discussions. Anoxic conditions may result in the release of redox sensitive metals and phosphorus, potentially impacting water quality in the lake. This effect may be long-lasting and impair the lake ecosystem into the future.

**BARGE LOADING AREA**

Shoreline disturbance due to the construction of a large barge loading area will have significant effects on lake biota. The referred to area is home to salamanders, fish fry, insect larvae, and leeches, all of which are important as food sources for the lake ecosystem. The impacts of such shoreline alteration in any other project would trigger a full Environmental Assessment, and this is especially called for in a protected ecosystem.

The shoreline area near this proposed loading area is also prone to liquefaction due to subsurface groundwater flow, and alteration of that flow has not been estimated or the impacts on lake hydrology considered. Groundwater has been shown by research to be a significant source of nitrogen to the lake ecosystem, and yet the impacts to nutrient flow have not been considered.

Moreover, the presence of nearshore invasive New Zealand mudsnails has been documented throughout the proposed barge loading area. In other lakes impacted by this species (including Capital Lake in Olympia, next to the State capital) watercraft and even water contact has been banned to minimize the spread of this species. Movement of barges from this area to the tunnel are certain to transport the invasive species to the tunnel and to dramatically increase the likelihood that this species will spread through the exit and down the Toutle River system. The potential impact of this species on aquatic resources beyond Spirit Lake are not considered at all in the draft decision. It is telling then that this potentially devastating species has not been mentioned once in the draft decision or the finding of no significant impact, or other public documents. Therefore, this decision is significantly lacking in addressing critical aspects of harm to the environment.

#### FINDING OF NO SIGNIFICANT IMPACT

4. The degree to which the effects on the quality of the human environment are likely to be highly controversial.

The justification for addressing this criterion ignores the impact on humans of significant visual human technological encroachment in public lands created expressly with the direction of preserving those lands for natural processes. The USFS wrongly uses researchers and research plots as the only controversial aspects of this project. Rather it is quite easy to see that impacts on the PUBLIC and their expressed desire to preserve this place are significant and have been stated in previous comment periods. This controversial TAKING of the public's right to witness this landscape as unaltered as possible has not been considered or even mentioned. Thus, the USFS has swept this controversy under the rug in hopes that it will disappear. Therefore, the USFS has not established a Finding of No Significant Impact and must reconsider that decision.

Sincerely,



Dr. James E. Gawel

